

Andrew Harding

From: Andrew Harding
Sent: Thursday, December 12, 2024 2:08 PM
To: Justin Pearson; Dylan Moore; Paul Sherman
Cc: RICHARD H. MATTHEWS; Anne Lahren
Subject: Benoir v. Parksley
Attachments: Defs Supplemental Production 12.12.24.pdf

Justin,

Good afternoon! In lieu of a privilege log, please see attached document (invoice for Wiggins to Parksley for October – November 2023) covering the period for the prior limited waiver of attorney client privilege on the retaliation claim.

Again, as before and still is the case, this production does not constitute a broader waiver of attorney-client privilege regarding the communications between Parksley and Wiggins. The waiver is limited only to the actual contents of this produced document in lieu of the privilege log you've requested, so you can evaluate your claims, and no further. In addition, we are not waiving objections to the use of these produced documents if this case goes to trial.

Please let me know if you have any questions or concerns.

Regards,
Andy

Andrew Harding

ATTORNEY

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